

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

FILED

MAR 28 2016

CLERK, U.S. DISTRICT COURT

By Deputy

UNITED STATES OF AMERICA

v.

No. 4:16-MJ-163

AMANDA ROSE CHAMBERLAIN	(01)
LEE FOGLE	(02)
DAVID RYAN HAAGENSEN	
a/k/a "David Hoss"	(03)
ROGER WAYNE LANGSTON	
a/k/a "Big Country"	(04)
KYLE ROBERT MIETH	
a/k/a "K-Wood"	(05)
JOSHUA JAMES MILSON	
a/k/a "Knucklehead"	(06)
MICHAEL JOHN MIZE	
a/k/a "Miklo"	(07)
MICHAEL DAVID STEPICH	(08)
DONALD LANCE TAYLOR	(09)
MELISSA VEATCH	
a/k/a "Missy"	(10)

SEALED
UNTIL WARRANT EXECUTED

CRIMINAL COMPLAINT

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning in or before January 2015, and continuing until on or about April 1, 2016, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendants, **Amanda Rose CHAMBERLAIN, Lee FOGLE, David Ryan HAAGENSEN**, also known as David Hoss, **Roger Wayne LANGSTON**, also known as Big Country, **Kyle Robert Mieth**, also known as K-Wood, **Joshua James MILSON**, also known as Knucklehead, **Michael John MIZE**, also known as Miklo, **Michael David Stepich, Donald Lance TAYLOR**, and **Melissa VEATCH**, also known as Missy, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), namely to possess with intent to distribute 50 grams or more of a

mixture and substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)).

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

I. INTRODUCTION

1. I have been a Special Agent of the DEA for approximately 16½ years. I received basic investigative instruction at the DEA Academy located in Quantico, Virginia, and additional continuing instruction regarding investigative techniques. I am currently assigned to the Fort Worth Resident Office (FWRO) of the DEA, Dallas Field Division, working with Investigators and Officers from the Fort Worth Police Department.

2. I have participated as a law enforcement officer in several investigations of unlawful narcotics distribution and have conducted wiretap investigations, physical and electronic surveillances, undercover transactions, the execution of search and arrest warrants, debriefings of informants, and review of taped conversations and drug records. Through my training, education and experience, I have become familiar with the manner in which illegal drugs are transported, stored and distributed, and the methods of payments for such drugs. I am also familiar with some of the methods by which narcotics traffickers communicate and code words commonly used by narcotics traffickers.

II. SUMMARY OF PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

3. As part of the conspiracy, not every person named or identified in the conspiracy knew every other person identified as being in the conspiracy. It was their joining together for the common purpose of possessing and distributing methamphetamine, the nature of the scheme to possess and distribute methamphetamine, and the overlapping among its members in possessing and distributing methamphetamine that established their membership in this particular conspiracy. And not every member of the conspiracy knew the details of each aspect of the conspiracy. Nevertheless, each member of the conspiracy knew or was aware of the conspiracy's general purpose and scope, which was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere, between and among the named conspirators and others not named.

4. As part of the conspiracy, its members had a fluid hierarchy that evolved over time. For example, as some members were arrested or otherwise temporarily unavailable, other members took over the receipt and delivery of methamphetamine.

5. Since approximately 2014, the government has been investigating allegations that **Amanda Rose CHAMBERLAIN, Lee FOGLE, David Ryan HAAGENSEN**, also known as David Hoss, **Roger Wayne LANGSTON**, also known as Big Country, **Kyle Robert Mieth**, also known as K-Wood, **Joshua James MILSON**, also known as Knucklehead, **Michael John MIZE**, also known as Miklo, **Michael David Stepich, Donald Lance TAYLOR**, and **Melissa VEATCH**, also known as Missy, along with Matthew Rutledge, Chris Nicholson, Shanda Hawkins, and Gavin Seguin, not named as defendants herein, and others not named have conspired together to possess methamphetamine with the intent to distribute it in the Northern District of Texas and elsewhere.

6. As part of the conspiracy, **Amanda Rose CHAMBERLAIN, Lee FOGLE, David Ryan HAAGENSEN**, also known as David Hoss, **Roger Wayne LANGSTON**, also known as Big Country, **Kyle Robert Mieth**, also known as K-Wood, **Joshua James MILSON**, also known as Knucklehead, **Michael John MIZE**, also known as Miklo, **Michael David Stepich, Donald Lance TAYLOR**, and **Melissa VEATCH**, also known as Missy, agreed to possess methamphetamine with the intent to distribute it, and knowingly and willfully participated in that agreement.

7. As part of the conspiracy, the common purpose between and among **Amanda Rose CHAMBERLAIN, Lee FOGLE, David Ryan HAAGENSEN**, also known as David Hoss, **Roger Wayne LANGSTON**, also known as Big Country, **Kyle Robert Mieth**, also known as K-Wood, **Joshua James MILSON**, also known as Knucklehead,

Michael John MIZE, also known as Miklo, **Michael David Stepich**, **Donald Lance TAYLOR**, and **Melissa VEATCH**, also known as Missy, along with others was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere.

8. As part of the conspiracy, in general, Michael Colby distributed methamphetamine to Rachel Adams who then re-distributed or brokered methamphetamine transactions between and amongst **Amanda Rose CHAMBERLAIN**, **Lee FOGLE**, **David Ryan HAAGENSEN**, also known as David Hoss, **Roger Wayne LANGSTON**, also known as Big Country, **Kyle Robert Mieth**, also known as K-Wood, **Joshua James MILSON**, also known as Knucklehead, **Michael John MIZE**, also known as Miklo, **Michael David Stepich**, **Donald Lance TAYLOR**, and **Melissa VEATCH**, also known as Missy.

9. As part of the conspiracy, its members routinely received and delivered ounce and multi-ounce quantities of methamphetamine that they then distributed to others in the Northern District of Texas and elsewhere.

10. As part of the conspiracy, some of the money derived from the sale and distribution of methamphetamine would be used to purchase additional quantities of methamphetamine.

III. FACTS ESTABLISHING PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

11. Below is a chronology of some relevant events:

- a. On March 3, 2015, Michael Colby is arrested by the Fort Worth Police Department in possession of approximately 1.7 grams of methamphetamine and multiple firearms.
- b. On March 17, 2015, Agents/Officers with Homeland Security, and the Fort Worth Police Department executed a search warrant at the residence of Rachel Adams, located at 1002 Cotton Wood Dr., Benbrook, Texas.
- c. On March 19, 2015, Michael Colby is arrested by the Fort Worth Police Department in possession of approximately eight (8) ounces of methamphetamine.
- e. Arrest of Shanda Hawkins, on March 27, 2015, on an outstanding Federal Arrest Warrant.
- f. Arrest of Chris Monroe on June 15, 2015, by Agents/Officers with the United States Marshal's Service and the Drug Enforcement Administration on an outstanding Federal Arrest Warrant.
- g. Arrest of Shawn Travis Cathey, on June 18, 2015, on an outstanding Federal Arrest Warrant.
- h. Arrest of Tiffany Billingsley on June 23, 2015, by Agents/Officers with the Drug Enforcement Administration on an outstanding Federal Arrest Warrant.
- i. Arrest of Cooperating Defendant-1 on November 13, 2015 by Agents/Officers with the Texas Department of Public Safety and the Drug Enforcement Administration on an outstanding Federal Arrest Warrant.
- j. Arrest of Cooperating Defendant-2 on November 13, 2015, by Agents/Officers with the Texas Department of Public Safety and the Drug Enforcement Administration on an outstanding Federal Arrest Warrant.

12. Cooperating Defendant-1 (CD1) identified **Amanda Rose CHAMBERLAIN** as a methamphetamine distributor whom she (CD1) knew to be drug partners with **Roger Wayne LANGSTON**. Specifically, CD1 said that in 2014 she had delivered eight (8) ounce quantities of methamphetamine on approximately three (3) occasions, and four (4) ounce quantities of methamphetamine approximately two (2) times per week for approximately eight (8) to ten (10) months to **CHAMBERLAIN** and **LANGSTON**. CD1 said that **LANGSTON** was present for numerous methamphetamine transactions with CD1 and **CHAMBERLAIN**. Co-conspirator Chris Monroe confirmed that **CHAMBERLAIN** was involved in the distribution of methamphetamine. Specifically, Monroe said that in 2014 on between five (5) and ten (10) occasions he purchased one-half ($\frac{1}{2}$) ounce of methamphetamine from **CHAMBERLIN**, and on between ten (10) and twenty (20) occasions he purchased one (1) ounce of methamphetamine from **CHAMBERLIN**. Monroe said that in addition to his methamphetamine-purchases from **CHAMBERLIN**, on at least five (5) occasions, he observed **CHAMBERLIN** with between one (1) pound and one (1) kilogram of methamphetamine. Additionally, Monroe said that on approximately five (5) occasions he observed **LANGSTON** receive four (4) ounce quantities of methamphetamine from **CHAMBERLAIN**.

13. Co-conspirator Shanda Hawkins identified **Lee FOGLE** as a methamphetamine distributor from who she (Feeney) had obtained one (1) ounce quantities of methamphetamine on approximately twenty (20) occasions.

Hawkins said that for a six week period of time in 2014 she had observed **FOGLE** in possession of approximately one kilogram of methamphetamine each day. **HAWKINS** also said that **FOGLE** would obtain one kilogram of methamphetamine each day from his methamphetamine source of supply. Co-conspirator Alisha Feeney identified **FOGLE** as a methamphetamine distributor whom she (Feeney) had during 2014 and 2015 supplied with a total of seven (7) ounces of methamphetamine in multiple ounce-quantity transactions. Additionally, Feeney said that she has seen **FOGLE** in possession of four (4) ounces on two (2) occasions. Alisha Feeney also said that on one (1) of these occasions she observed **FOGLE** purchasing four (4) ounces of methamphetamine from another co-conspirator.

14. Cooperating Defendant-2 (CD2) identified **David Ryan HAAGENSEN** as a methamphetamine distributor who he (CD2) had seen supply another co-conspirator with approximately four (4) ounce quantities of methamphetamine. Additionally, CD2 said that between approximately January 2015 and May 2015, on a daily basis, he (CD2) knew that another co-conspirator purchased two ounce quantities of methamphetamine from **HAAGENSEN**, and that for a one month period he (CD2) helped that co-conspirator sell two ounces of methamphetamine, every day, to multiple customers. A cooperating source (hereinafter CS) identified **HAAGENSEN** as a methamphetamine customer of Rachel Adams. Specifically, the CS stated that at the direction of Rachel Adams the CS delivered four (4) ounce quantities of methamphetamine to **HAAGENSEN**.

Additionally, the CS said that on at least two (2) occasions he/she delivered one (1) pound quantities of methamphetamine to **HAAGENSEN**. The CS said that on two (2) additional occasions he/she delivered to **HAAGENSEN** four (4) ounce quantities of methamphetamine. The CS also said that on one occasion he/she received eight (8) ounces of methamphetamine from **HAAGENSEN** at the direction of Rachel Adams. Additionally, the CS said that on multiple occasions he/she observed **HAAGENSEN** carrying a semiautomatic pistol.

15. Co-conspirator Tiffany Billingsley identified **Roger Wayne LANGSTON** as a methamphetamine distributor whom she (Billingsley) considered her partner for a period of time in 2014 when they distributed methamphetamine together. Specifically, Billingsley said that she and **LANGSTON** together supplied methamphetamine to Chris Monroe. Additionally, Billingsley said that she was with **LANGSTON** on two occasions when he received four (4) ounce quantities of methamphetamine from Michael Colby. CD1 and Chris Monroe also identified **LANGSTON** as a methamphetamine distributor as detailed in paragraph #12 of this affidavit.

16. Co-conspirator Shanda Hawkins identified **Kyle Robert Mieth** as a methamphetamine distributor who she (Hawkins) identified as a "runner" for Rachel Adams who assisted her (Adams) with her methamphetamine distribution. Hawkins said that she witnessed **MIETH** and Adams obtain one (1) kilogram of methamphetamine from one of Adams's sources of supply on one (1) occasion.

Additionally, Hawkins said that she had witnessed Adams deliver one (1) ounce of methamphetamine to **MIETH** on two (2) occasions. CD2 confirmed that **MIETH** was involved in distributing methamphetamine. Specifically, CD2 said that between January and May 2015, on approximately eight (8) occasions, he supplied **MIETH** two (2) ounce quantities of methamphetamine.

17. Co-conspirator Shanda Hawkins identified **Joshua James MILSON** as a methamphetamine distributor who she (Hawkins) identified as a “runner” for and methamphetamine customer of Rachel Adams.

Specifically, Hawkins said that for an approximately six (6) week period, on a daily basis, she (Hawkins) obtained eight (8) ounces of methamphetamine from **MILSON**.

Co-conspirator Shawn Travis Cathey confirmed that **Joshua James MILSON** was a methamphetamine distributor. Specifically, he (Cathey) identified **MILSON** as a methamphetamine customer and “runner” for Rachel Adams. Cathey explained that for at least two (2) months in 2015 **MILSON** obtained and redistributed four (4) ounces of methamphetamine each day for Adams.

18. Co-conspirator Alisha Feeney identified **Michael John MIZE** as a methamphetamine distributor who she (Feeney) had in or about 2011 or 2012, on approximately (10) occasions, observed obtain two (2) ounce quantities of methamphetamine on at least fourteen (14) occasions, and obtain one (1) ounce quantities of methamphetamine from multiple sources of supply.

Feeney also said that between 2011 and 2014 she had on at least six (6) occasions supplied **MIZE** with four (4) ounces of methamphetamine. Co-conspirator Shanda Hawkins also identified **MIZE** as a methamphetamine distributor. Specifically, she (Hawkins) identified **MIZE** as a “runner” for and a methamphetamine customer of Rachel Adams. Hawkins said that she had witnessed **MIZE** in possession of one (1) kilogram of methamphetamine at Adams’s residence. Additionally, Hawkins said that she had observed **MIZE** obtain two (2) ounces of methamphetamine from Adams on at least five (5) occasions in 2015.

19. Co-conspirator Alisha Feeney identified **Michael David STEPICH** as a methamphetamine distributor to whom she (Feeney) had on one (1) occasion, supplied with one (1) pound of methamphetamine, on one (1) occasion, supplied with eight (8) ounces of methamphetamine, and on six (6) occasions, supplied with four (4) ounces of methamphetamine. Co-conspirator Travis Cathey also identified **STEPICH** as a methamphetamine distributor to whom he (Cathey) identified as a methamphetamine customer and “runner” for Rachel Adams. Cathey said that for at least two (2) months, he (Cathey) observed **STEPICH** obtaining and redistributing four (4) and six (6) ounce quantities of methamphetamine each day for Adams.

20. Co-conspirator Shanda Hawkins identified **Donald Lance TAYLOR** as a methamphetamine distributor to whom she (Hawkins) in 2014 had delivered two (2) ounces of methamphetamine on one (1) occasion and one (1) ounce of methamphetamine on one (1) occasion.

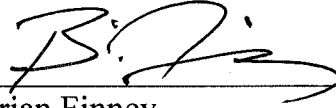
Additionally, Hawkins said that **TAYLOR** had obtained one (1) ounce of methamphetamine on three (3) to four (4) occasions from co-conspirator Brian Harris. Hawkins said that on one (1) occasion she observed **TAYLOR** obtain two (2) ounces of methamphetamine from Matthew Rutledge. Additionally, Hawkins said that she had witnessed **TAYLOR** and Rachel Adams in possession of one (1) kilogram of methamphetamine on approximately three (3) occasions. Co-conspirator Shawn Travis Cathey confirmed that **TAYLOR** was involved in the distribution of methamphetamine. Specifically, Cathey said that **TAYLOR** was a customer and “runner” for Adams. Additionally, Cathey said that every day for at least two (2) months in 2015 **TAYLOR** obtained and redistributed one (1) to two (2) ounces of methamphetamine for Adams.

21. Co-conspirator Michael Colby identified **Melissa VEATCH** as a methamphetamine distributor to whom he (Colby) had “fronted” four (4) ounces of methamphetamine to **VEATCH** in 2015 that **VEATCH** never paid for. Additionally, Colby said that on one (1) other occasion **VEATCH** stole four (4) ounces of methamphetamine from him. A cooperating source (hereinafter CS) identified **VEATCH** as a methamphetamine customer of Rachel Adams. Specifically, the CS at that at the direction of Rachel Adams the CS delivered eight (8) ounce quantities of methamphetamine to **VEATCH** and picked up money for methamphetamine that had previously been supplied to **VEATCH** by Adams. Additionally, the CS said that on multiple occasions he/she observed **VEATCH** in possession of multi-ounce quantities of methamphetamine.

Co-conspirator Alisha Feeney also identified **VEATCH** as a methamphetamine distributor to whom she (Feeney) had on one (1) occasion supplied eight (8) ounce methamphetamine. Specifically, Feeney said that she (Feeney) was paid the money for the eight (8) ounces of methamphetamine by **VEATCH** and she then handed the money to Shawn Travis Cathey. However, Feeney was not present when Shawn Travis Cathey delivered the eight (8) ounces of methamphetamine to **VEATCH**. Additionally, Feeney said that on at least two (2) occasions she observed **VEATCH** in possession of approximately sixteen (16) ounces of methamphetamine, and on an additional five (5) occasions in possession of eight (8) ounces of methamphetamine.

22. Based on the foregoing, the Complainant believes that probable cause exists that **Amanda Rose CHAMBERLAIN, Lee FOGLE, David Ryan HAAGENSEN**, also known as David Hoss, **Roger Wayne LANGSTON**, also known as Big Country, **Kyle Robert Mieth**, also known as K-Wood, **Joshua James MILSON**, also known as Knucklehead, **Michael John MIZE**, also known as Miklo, **Michael David Stepich, Donald Lance TAYLOR**, and **Melissa VEATCH**, also known as Missy, along with others both known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of

21 U.S.C. §§ 841(a)(1) & (b)(1)(B), namely to distribute and to possess with intent to distribute more than 50 grams of methamphetamine, in violation of 21 U.S.C. § 846.



Brian Finney
Special Agent
Drug Enforcement Administration

SWORN AND SUBSCRIBED before me, at 10:33 ~~am~~ ^{pm}, this 28th day of March, 2016, in Fort Worth, Texas.



JEFFREY L. CURETON
United States Magistrate Judge